

**EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:	)	
	)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,	)	
	)	Chapter 11
Debtor.	)	
	)	
	)	
CDS BUSINESS SERVICES, INC. d/b/a	)	
NEWTEK BUSINESS CREDIT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adv. Proc. No. 3:20-ap-90140
	)	
	)	
AMERICA CARES TRUST (ACT) d/b/a	)	
CARENATION	)	
	)	
Defendant.	)	

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**AFFIDAVIT OF DANIEL H. PURYEAR  
IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT**

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Comes now the Affiant, Daniel H. Puryear, being duly sworn, deposes and states:

1. On September 23, 2021, CDS Business Services, Inc. d/b/a Newtek Business Credit ("Plaintiff") filed an Amended and Supplemental Complaint against America Cares Act (ACT) d/b/a CareNation ("Defendant").
2. All factual statements contained in the Amended and Supplemental Complaint are true and correct to the best of my knowledge.

3. On September 23, 2021, service of the Amended and Supplemental Complaint was made on the Defendant by serving it via United States First Class Mail, as follows:

America Cares Trust d/b/a CareNation  
c/o Michael Gaw, Registered Agent  
5655 Granny White Pike  
Brentwood, TN 37027

America Cares Trust d/b/a CareNation  
10 Eldad Road  
Fayetteville, TN 37334

America Cares Trust d/b/a CareNation  
Attn: Michael Gaw  
4117 Hillsboro Pike, Suite 103  
Nashville, TN 37215

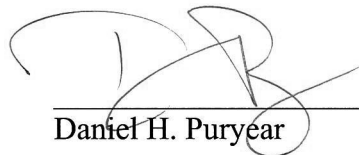
4. The deadline to respond to the Amended and Supplement Complaint was October 7, 2021.

5. As reflected in the Court's records as of the date of this Affidavit, the Defendant has not filed an answer or other responsive pleading within 14 days of the Amended and Supplemental Complaint, as required per the Court's Order Granting Amended Order Regarding Motion to File Amended and Supplemental Complaint [Doc. 86] and Fed. R. Bankr. P. 7015, and Fed. R. Civ. P. 15(a)(3).

6. The Defendant is not an incompetent or an infant.

7. The Defendant is not serving in military service.

Further Affiant Saith Not.

  
\_\_\_\_\_  
Daniel H. Puryear

*Counsel for CDS Business Services, Inc.  
d/b/a Newtek Business Credit*

STATE OF TENNESSEE           )  
  )  
COUNTY OF DAVIDSON        )

Before me, Shonda M. Chaffin, a notary public in said county and state, personally appeared Daniel H. Puryear to me personally known or proved to me upon sufficient proof thereof, and acknowledged that he executed the within instrument for the purposes contained therein.

Witness my hand and seal on this the 12 day of October, 2021.



Smchaffin  
Notary Public  
1/29/23  
My Commission Expires